

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

FILED BY *Arz* D.C.
03 MAR 26 PM 5:10

Robert R. Di Trolio
CLERK U.S. DIST. CT.
W.D. OF TN. MEMPHIS

UNITED STATES OF AMERICA,

PLAINTIFF,

vs.

VERNICE B. KUGLIN,

DEFENDANT.

CR. NO. **03-20111 MIA**
26 U.S.C. § 7201

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

That during the calendar year 1996, the defendant,

----- **VERNICE B. KUGLIN** -----

had and received taxable income in the sum of approximately \$162,883.75, that well knowing and believing the foregoing facts, the defendant, on or about April 15, 1997, in the Western District of Tennessee, did willfully attempt to evade and defeat the said income tax due and owing by her to the United States of America for said calendar year by failing to make an income tax return on or before April 15, 1997, as required by law, to any proper officer of the Internal Revenue Service and by failing to pay the Internal Revenue Service said income tax, in violation of Title 26, United States Code, Section 7201.

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COUNT 2

That during the calendar year 1997, the defendant,

----- **VERNICE B. KUGLIN** -----

had and received taxable income in the sum of approximately \$147,999.60, that well knowing and believing the foregoing facts, the defendant, on or about April 15, 1998, in the Western District of Tennessee, did willfully attempt to evade and defeat the said income tax due and owing by her to the United States of America for said calendar year by failing to make an income tax return on or before April 15, 1998, as required by law, to any proper officer of the Internal Revenue Service, by failing to pay the Internal Revenue Service said income tax, and by filing a false Form W-4 in 1997, in violation of Title 26, United States Code, Section 7201.

COUNT 3

That during the calendar year 1998, the defendant,

----- **VERNICE B. KUGLIN** -----

had and received taxable income in the sum of approximately \$137,197.93, that well knowing and believing the foregoing facts, the defendant, on or about April 15, 1999, in the Western District of Tennessee, did willfully attempt to evade and defeat the said income tax due and owing by her to the United States of America for said calendar year by failing to make an income tax return on or before April 15, 1999, as required by law, to any proper officer of the Internal Revenue Service, by failing to pay the Internal Revenue Service said

income tax, and by filing a false Form W-4 in 1998, in violation of Title 26, United States Code, Section 7201.

COUNT 4

That during the calendar year 1999, the defendant,

----- **VERNICE B. KUGLIN** -----

had and received taxable income in the sum of approximately \$146,571.66, that well knowing and believing the foregoing facts, the defendant, on or about April 15, 2000, in the Western District of Tennessee, did willfully attempt to evade and defeat the said income tax due and owing by her to the United States of America for said calendar year by failing to make an income tax return on or before April 17, 2000, as required by law, to any proper officer of the Internal Revenue Service, by failing to pay the Internal Revenue Service said income tax, and by filing a false Form W-4 in 1999, in violation of Title 26, United States Code, Section 7201.

COUNT 5

That during the calendar year 2000, the defendant,

----- **VERNICE B. KUGLIN** -----

had and received taxable income in the sum of approximately \$164,224.28, that well

knowing and believing the foregoing facts, the defendant, on or about April 15, 2001, in the Western District of Tennessee, did willfully attempt to evade and defeat the said income tax due and owing by her to the United States of America for said calendar year by failing to make an income tax return on or before April 16, 2001, as required by law, to any proper officer of the Internal Revenue Service, by failing to pay the Internal Revenue Service said income tax, and by filing a false Form W-4 in 2000, in violation of Title 26, United States Code, Section 7201.

COUNT 6

That during the calendar year 2001, the defendant,

----- **VERNICE B. KUGLIN** -----

had and received taxable income in the sum of approximately \$161,189.07, that well knowing and believing the foregoing facts, the defendant, on or about April 15, 2002, in the Western District of Tennessee, did willfully attempt to evade and defeat the said income tax due and owing by her to the United States of America for said calendar year by failing to make an income tax return on or before April 15, 2002, as required by law, to any proper officer of the Internal Revenue Service, by failing to pay the Internal Revenue Service said

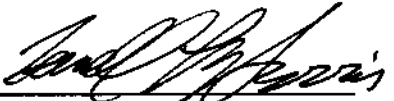
income tax, and by filing a false Form W-4 in 2001, in violation of Title 26, United States Code, Section 7201.

A TRUE BILL:

s/Grand Jury Foreperson

Grand Jury Foreperson

DATED: 3-26-03


Terrell L. Harris
United States Attorney
Western District of Tennessee